UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MICHAEL PHILIP KAUFMAN,

No. 16-CV-2880-LTS-SN

Plaintiff,

V.

MICROSOFT CORPORATION,

Defendant.

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS TO DEFENDANT MICROSOFT CORPORATION

Pursuant to LPR 6 and Pre-Trial Scheduling Order No. 1 (D.I. 32) (and N.D. Cal. LPR 3-1 and 3-2, as incorporated therein), Plaintiff, Michael Philip Kaufman ("Kaufman"), through the undersigned counsel, hereby submits his Disclosure of Asserted Claims and Infringement Contentions to Defendant Microsoft Corporation ("Microsoft"), by service upon its counsel.

Kaufman is asserting claims 1-5 of Patent No. 7,885,981 (the "'981 Patent") against Microsoft's ASP.NET Dynamic Data software ("Dynamic Data"). The attached chart identifies specifically where each limitation of each asserted claim is found within Dynamic Data. Microsoft is accused of infringing each of claims 1-5 pursuant to 35 U.S.C. §§ 271(a)-(b) and claims 1-4 pursuant to 35 U.S.C. § 271(c). This is further outlined within the chart. All limitations are literally present.

The priority date to which each of claims 1-5 are entitled is October 31, 2000.

Pursuant to N.D. Cal. LPR 3-1(g), Kaufman asserts that the Schemalive product practices each of claims 1-5.

Pursuant to N.D. Cal. LPR 3-1(h), Kaufman has alleged that Microsoft's infringement of the '981 Patent is willful. The bases for this allegation are detailed in the Complaint (D.I. 1 ¶¶ 64-67). Kaufman notes that discovery is just now beginning. To the extent that discovery yields further information relevant to willfulness, Kaufman reserves the right to rely on such information.

Pursuant to N.D. Cal. LPR 3-2(a)-(b), the parties are finalizing the terms of the proposed confidentiality order. Kaufman will produce responsive documents as soon as practicable after that order is finalized.

Documents responsive to N.D. Cal. LPR 3-2(c) can be found at Bates Nos. MPK45-395. Documents responsive to N.D. Cal. LPR 3-2(d) can be found at Bates Nos. MPK33-35. For N.D. Cal. LPR 3-2(e), information sufficient to show the operation of the instrumentality identified above for N.D. Cal. LPR 3-1(g) is contained within the disclosure of the '981 Patent, including the code therein.

Plaintiff reserves the right to amend these contentions, and to produce and/or rely upon additional documents in support of infringement contentions located through discovery.

Dated: August 23, 2016

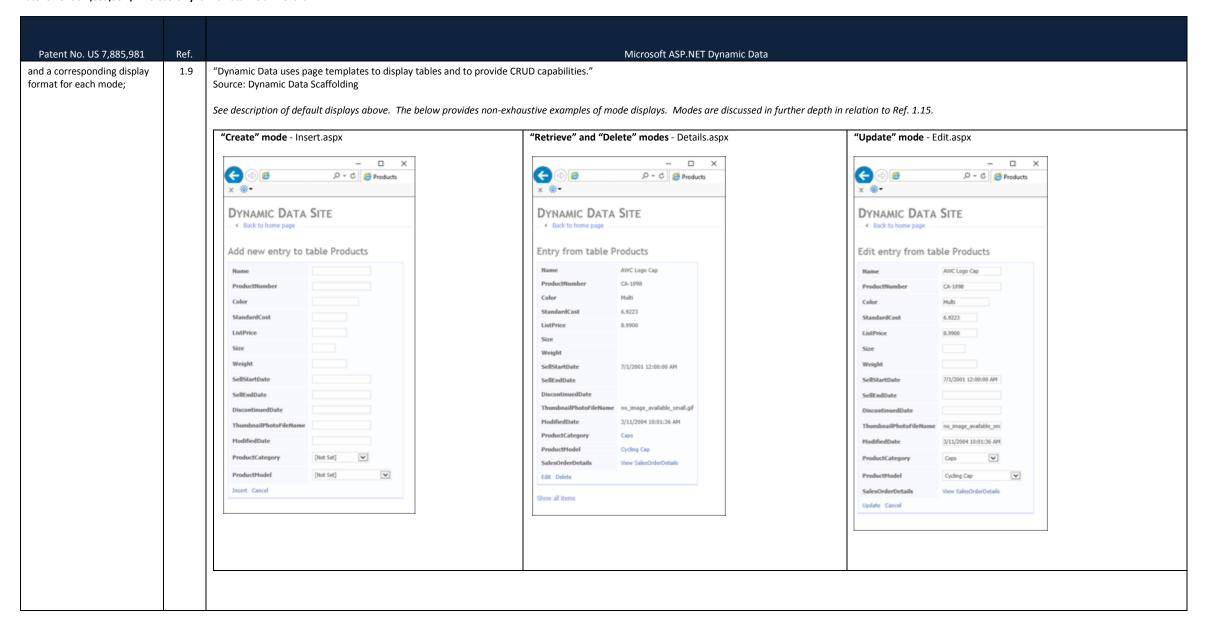
Ronald Abramson David G. Liston **LEWIS BAACH pllc** The Chrysler Building 405 Lexington Avenue New York, NY 10174 Tel: (212) 826-7100

Attorneys for Plaintiff Michael Philip Kaufman

Patent No. US 7,885,981	Ref.	Microsoft ASP.NET Dynamic Data
A method for operating a server comprising	1.1	"ASP.NET Dynamic Data lets you create extensible data-driven Web applications" Source: ASP.NET Dynamic Data Overview, available at: https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100">https://msdn.microsoft.com/en-us/library/ee845452(v=VS.100")<a)<a="" a="" and="" based="" create="" data="" data."="" dataautomatically="" database.="" dynamic="" each="" editing="" example="" for="" functional="" generate[s]="" href="https://msdn.microsoft.com/en-us/lib</td></tr><tr><td>a processor for automatically generating an end-user interface for working with the data within a relational database</td><td>1.2</td><td>" in="" lets="" of="" on="" overview.="" pages="" scaffolding="" schema="" screen="" shot="" site="" source:="" table="" td="" the="" viewing="" web="" you="" <="">
defined within a relational DBMS whose data is stored in machine-readable media and which is accessible to said server,	1.3	Dynamic Data uses either the "LINQ to SQL" model or the "ADO.NET Entity Framework" model to create a data model from a connected database. Source: Walkthrough: Creating a New Dynamic Data Web Site Using Scaffolding, available at https://msdn.microsoft.com/en-us/enus/library/cc488469.aspx (hereinafter "Walkthrough") "In LINQ to SQL, the data model of a relational database is mapped to an object model expressed in the programming language of the developer." Source: LINQ to SQL, available at https://msdn.microsoft.com/en-us/library/bb386976.aspx "Entity Framework (EF) is an object-relational mapper that enables .NET developers to work with relational data using domain-specific objects." Source: Entity Framework, available at https://msdn.microsoft.com/en-us/data/ef

Patent No. US 7,885,981 wherein said relational database comprises a plurality of tables, constraints and relationships stored in said DBMS in accordance with a data model comprising said tables and their column- complements and datatypes, said constraints, and the relationships across said tables, and	1.4	"The data layer contains a model that represents the entities in a database and how these entities relate to each other. At run time, Dynamic Data automatically extracts metadata information from the data model, such as data field properties. From this information, it infers how to create UI for displaying and editing data. To render the UI, it uses the following information: Information about associations between tables is used to display foreign-key columns and to support navigation between tables. Data-type information is used to add validation and to select the appropriate field templates for a data field. For example, information about columns that allow null values can be used to determine whether a data field is required. Length information can be used to restrict the maximum length of user's text input. The data type of a field is used to determine which field template to use to render the UI for that field." Source: ASP.NET Dynamic Data Layer Customization, available at https://msdn.microsoft.com/en-us/library/ee225428.aspx (hereinafter "Dynamic Data Layer Customization")
wherein said relational database may be of any arbitrary size or complexity, said method comprising	1.5	There are no stated limitations on the size or complexity of supported databases in any Dynamic Data documentation.
(a) providing an output stream from said server, for user display and input devices,	1.6	ASP.NET Dynamic Data delivers a Web application (see Dynamic Data Overview), which incorporates an output stream (i.e., HTML over HTTP, from the web server to a web-browser client).
defining a user interface paradigm comprising a set of modes for interacting with a given database table,	1.7	The Dynamic Data user interface includes a set of modes for interacting with database tables: "Scaffolding refers to the Dynamic Data elements that automatically generate Web pages for each table in a database. These auto-generated Web pages provide create, read, update and delete (CRUD) operations for each table. Functional pages are generated automatically and include database CRUD capabilities" Source: ASP.NET Dynamic Data Scaffolding, available at: https://msdn.microsoft.com/en-us/library/ee377606(v=vs.100).aspx (hereinafter "Dynamic Data Scaffolding")

D-1 No. 115 7 005 004	Def		Missassifi ACD NET Durantis Data
Patent No. US 7,885,981 said modes comprising create, retrieve, update and delete,	Ref. 1.8	Source: Dynamic Data "Page templates are Source: Dynamic Data	Web pages that render data from any table in the database. Dynamic Data includes page templates for different views of data"
		Page Template	Description
		Details.aspx	Provides a detailed view of a single row in the database. This is the default template for select operations. It uses a DetailsView control to display the data.
		Edit.aspx	Provides a page that lets users edit a single row of a database table. This is the default template for edit operations. It uses a DetailsView control.
		Insert.aspx	Provides a page that lets users insert a single row into a database table. This is the default template used for insert operations. It uses a DetailsView control.
		List.aspx	Displays a list of rows from a database table. This is the default template that is used for displaying a table. This template provides DropDownList controls that let users filter data, sort, and page. It uses a GridView control.
		ListDetails.aspx	Displays a list of rows from a database table. The template lets users filter data, sort, and page. The template uses a GridView control for the list of rows and uses a DetailsView control for the selected row to let users insert a new record.
			This template presents all-in-one functionality. Dynamic Data does not use it by default. You can change the configuration in the Global.aspx file to use this template instead of using individual templates (such as List.aspx and Edit.aspx) for different operations.
		Source: Dynamic Data	a Scaffolding



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Patent No. US 7,885,981 / Microsoft Dynamic Data - Claim Chart

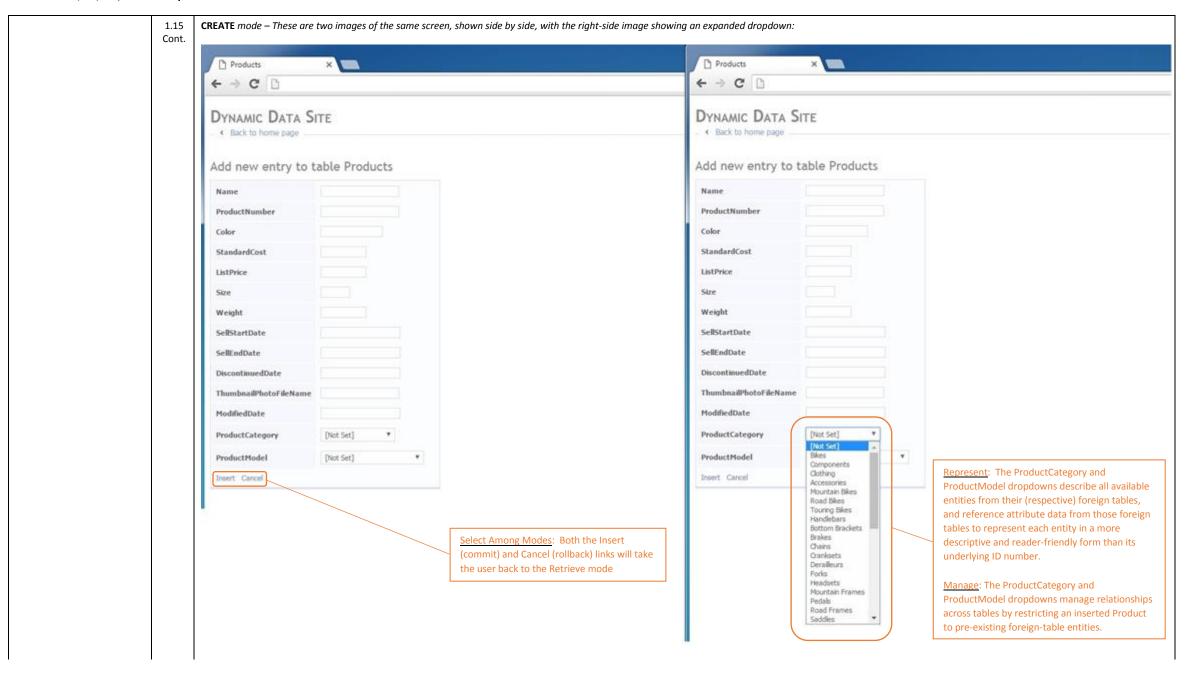
"Retrieve" and "Delete" modes - List.aspx and a corresponding display 1.9 Cont. format for each mode; - 0 X (continued) × ,O + ♂ Ø Products 命会學會 × ** DYNAMIC DATA SITE € Back to home page : Products ProductCategory All ProductModel All Name ProductNumber Color StandardCost ListPrice Size Weight SettStartDate SellEndDate ThumbnallPhotoFileName ModifiedDate ProductCategory ProductModel SalesOrderDetails Edit Delete Details HL Road Frame - Black, 58 FR-R928-58 1059.3100 1431,5000 1016.04 6/1/1998 12:00:00 AM 7/10/2016 12:00:00 AM o_image_available_sma... 3/11/2004 10:01:36 AM load Frames HL Road Frame View SalesOrderOetails Edit Delete Details Sport-100 Helmet, Red HL-U509-R 13.0863 34,9900 7/1/2001 12:00:00 AM no image available sma... 3/11/2004 10:01:36 AM lelmets. Savet-100 View SalesOrderOetails Edit Delete Details Sport-100 Helmet, Black HL-U509 13.0063 34.9900 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM Sport-100 View SalesOrderOetails 9.5000 Edit Delete Details SO-8909-M 3.3963 7/1/2001 12:00:00 AM 6/30/2002 12:00:00 AM 3/11/2004 10:01:36 AM View SalesOrderOetails Mountain Bike Socks, M. White no_image_available_sma... Mountain Bike Socks 34,9900 Edit Delete Details Sport-100 Helmet, Blue HL-U509-B 13.0863 7/1/2001 12:00:00 AM o_inage_avallable_sma... 3/11/2004 10:01:36 AM Sport-100 View SalesOrderOetails 6.9223 8,9900 Edit Delete Details AWC Logo Cap CA-1098 Multi 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM Cycling Cap View SalesOrderOetails no image available sma... L3-0192-5 Multi 38.4923 49,9900 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM View SalesOrderOetails Edit Delete Details avc_jersey_male_small.gif Long-Sieeve Logo Jersey Edit Delete Details L3-0192-M Multi 38.4923 49,9900 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM View SalesOrderDetails Long-Steeve Logo Jerse... avc_jersey_male_smalt.gif Long-Sleeve Logo Jersey Edit Delete Details Long-Sleeve Logo Jerse... L3-0192-L Hulti 38.4923 49.9900 7/1/2001 12:00:00 AM awc_jersey_male_small.gif 3/11/2004 10:01:36 AM Jerseys Long-Sineve Logo Jersey View SalesOrderOetails Edit Delete Details Long-Sieeve Logo Jerse... L3-0192-X Multi 49,9900 7/1/2001 12:00:00 AM awc_javsey_male_small.gif 3/11/2004 10:01:36 AM Long-Sieeve Logo Jersey View SalesOrderOetails H 4 Page 1 of 30 ▶ H Results per page: 10 💙 . Insert new item

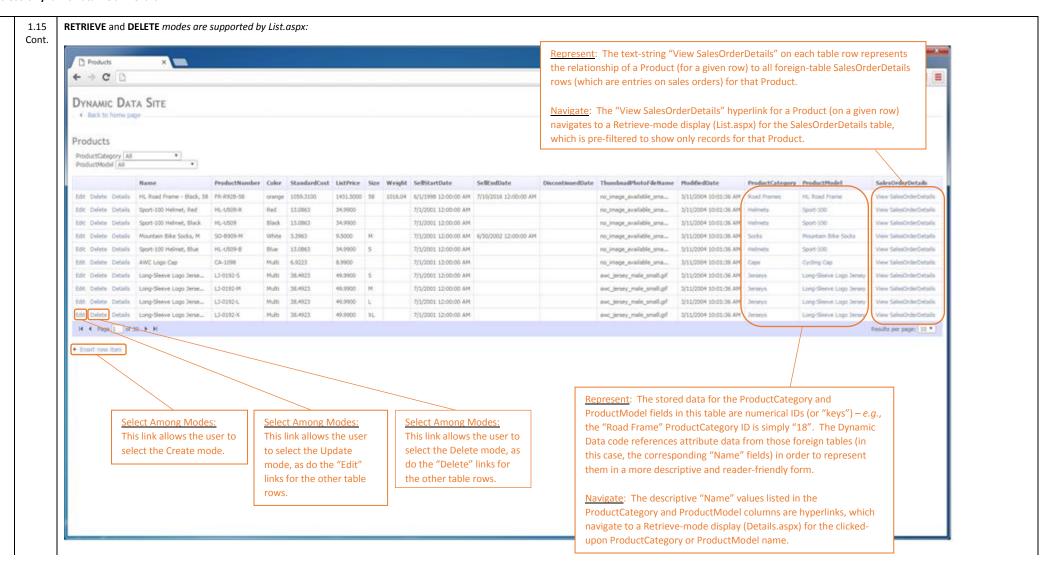
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An alternate configuration provides a "ListDetails" template providing access to multiple modes: and a corresponding display 1.9 Cont. format for each mode; "You can change the configuration in the Global.aspx file to use this template instead of using individual templates (such as List.aspx and Edit.aspx) for different operations." (continued) Source: Dynamic Data Scaffolding "Retrieve" mode and "Delete" mode - ListDetails.aspx (Includes direct access to "Create" and "Update" modes, as annotated in the discussion of ALTERNATE CONFIGURATION in Ref. 15 Cont., below) - 0 X 命会學 😃 ,O → C Products x ※* DYNAMIC DATA SITE ■ Back to home page. Products ProductCategory All ProductModel All ListPrice Size Weight ThumbnailPhotoFileName Name ProductNumber Color StandardCost SellStartDate SellEndDate ModifiedDate ProductCategory ProductHodel SalesOrderDetails Edit Delete Select HL Road Frame - Black, 58 FR-R528-58 1431,5000 6/1/1998 12-00-00 AM 7/10/2016 12:00:00 AM o_image_available_sma... 3/11/2004 10:01:36 AM Road Frames View SalesOrderOetails 34.9900 Edit Delete Select Sport-100 Helmet, Red HL-U509-R 13.0863 7/1/2001 12:00:00 AM no image available sma 3/11/2004 10:01:36 AM orimets Sport-100 View SalesOnderOetails Edit Delete Select Sport-100 Helmet, Black HL-U509 Black 13.0863 34.9900 7/1/2001 12:00:00 AM no_image_available_sma... 3/11/2004 10:01:36 AM leimets Sport-100 View SalesOrderOetails 3.3963 9.5000 Edit Delete Select Hountain Bike Socks, H 50-8909-H White 7/1/2001 12:00:00 AM 6/30/2002 12:00:00 AM 3/11/2004 10:01:36 AM Mountain Bike Socks View SalesOrderOetails o image available sma... Edit Delete Select Mountain Bike Socks, L. 50-8909-L White 3.3963 9.5000 7/1/2001 12:00:00 AM 6/30/2002 12:00:00 AM 3/11/2004 10:01:36 AM Mountain Bike Socks View SalesOntierOetails 34.9900 3/11/2004 10:01:36 AM View SalesOnderOntails Edit Delete Select Sport-100 Helmet, Blue HL-U509-8 13.0863 7/1/2001 12:00:00 AM Sport-100 no image available sma... AWC Logo Cap Hulti 8.9900 Edit Delete Select CA-1098 6.9223 7/1/2001 12:00:00 AM no_image_available_sma... 3/11/2004 10:01:36 AM Cycling Cap View SalesOrderOetails Edit Delete Select Long-Sleeve Logo Jerse... L)-0192-5 Multi 38.4923 49.9900 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM View SalesOrderOxtails ovc_jersey_male_small.gif Long-Sleeve Logo Jersey Huts 49.9900 Edit Delete Select Long-Sleeve Logo Jerse... L3-0192-M 38.4923 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM View SalesOnderOstalis awc_jersey_male_small.gif Long-Sieeve Logo Jersey Edit Delete Select Long-Sleeve Logo Jerse... L)-0192-L Multi 49.9900 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM Long-Sleeve Logo Jersey View SalesOrderOetails awc jersey male small.gif H 4 Page 1 of 30 ≯ H Results per page: 10 💙 Name HL Road Frame - Black, 58 FR-R928-58 orange StandardCost 1059,3100 ListPrice 1431.5000 Size 58 1016.04 Weight 6/1/1998 12:00:00 AM SellEndDate 7/10/2016 12:00:00 AM DiscontinuedDate ThumbnailPhotoFileName ro_image_available_smail.gif ModifiedDate 3/11/2004 10:01:36 AM ProductCategory Road Frames SalesOrderDetails Edit Delete New

1.10	"ASP.NET Dynamic Data lets you create extensible data-driven Web applications by inferring at run time the appearance and behavior of data entities from the database schema and deriving UI behavior from it." "At run time, Dynamic Data automatically extracts metadata information from the data model, such as data field properties." Source: Dynamic Data Overview
1.11	"As the illustrations [sic] shows, Dynamic Data architecture contains the following layers: Data layer, which contains the data model that represents the database entities as CLR [Common Language Runtime] types." Source: Dynamic Data Overview
1.12	"When scaffolding is enabled, ASP.NET analyzes the data model and generates Web pages dynamically based on the metadata information. These auto-generated Web pages provide CRUD capabilities for each table." Source: Dynamic Data Overview
1.13	"When scaffolding is enabled, ASP.NET analyzes the data model and generates Web pages dynamically based on the metadata information. These auto-generated Web pages provide CRUD capabilities for each table." Source: Dynamic Data Overview
1.14	See Ref. 1.9 above as to display formats. "Page templates are Web pages that render data from any table in the database. Dynamic Data includes page templates for different views of data" Source: Dynamic Data Overview "Dynamic Data uses page templates to display tables and to provide CRUD capabilities." Source: Dynamic Data Scaffolding The user interacts with the data in tables via "predefined pages to perform CRUD operations"
	1.11

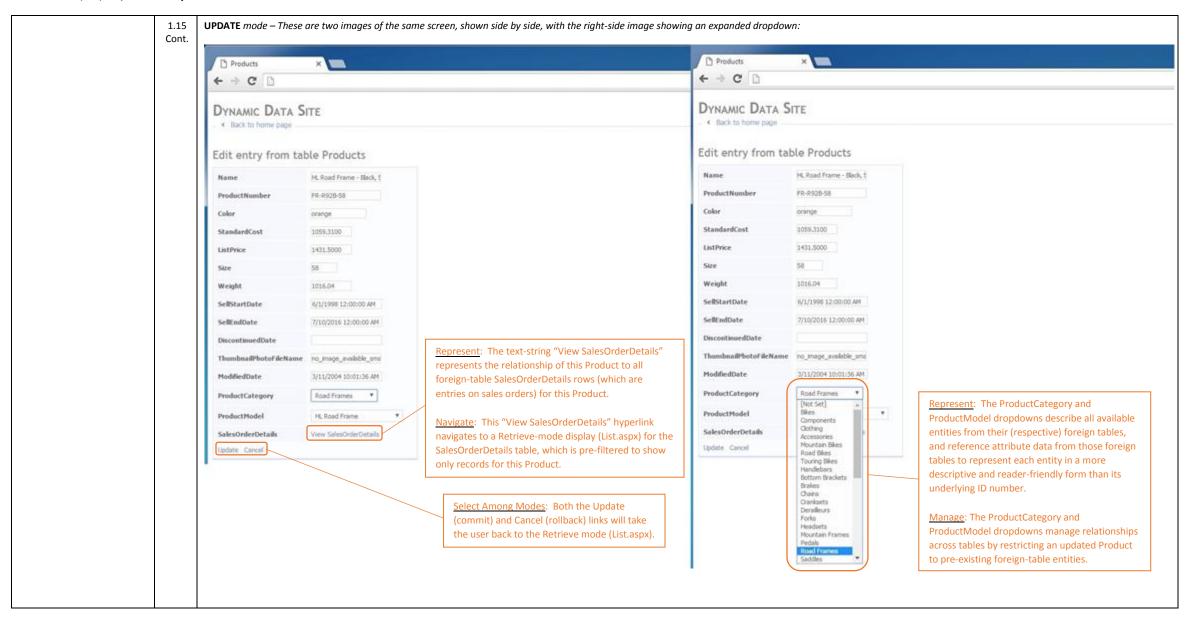
integrates into each said mode display processes	1.15	"At run time, Dynamic Data automatically extracts metadata information from the data model, such as data field properties. From this information, it infers how to create UI for displaying and editing data. To render the UI, it uses the following information:
for representing, navigating, and managing said		 Information about associations between tables is used to display foreign-key columns and to support navigation between tables." Source: Dynamic Data Layer Customization
relationships across tables, for selecting among said		" auto-generated Web pages provide the capability to display, insert, delete, and edit data for each table" Source: Walkthrough
modes, and for navigating across said tables and		The user interacts with the data in tables via "predefined pages to perform CRUD operations" Source: Dynamic Data Overview
interacting in accordance the selected mode with the data in the tables that are reached by said navigation,		This continues to work on Dynamic Data as the user navigates from table to table.

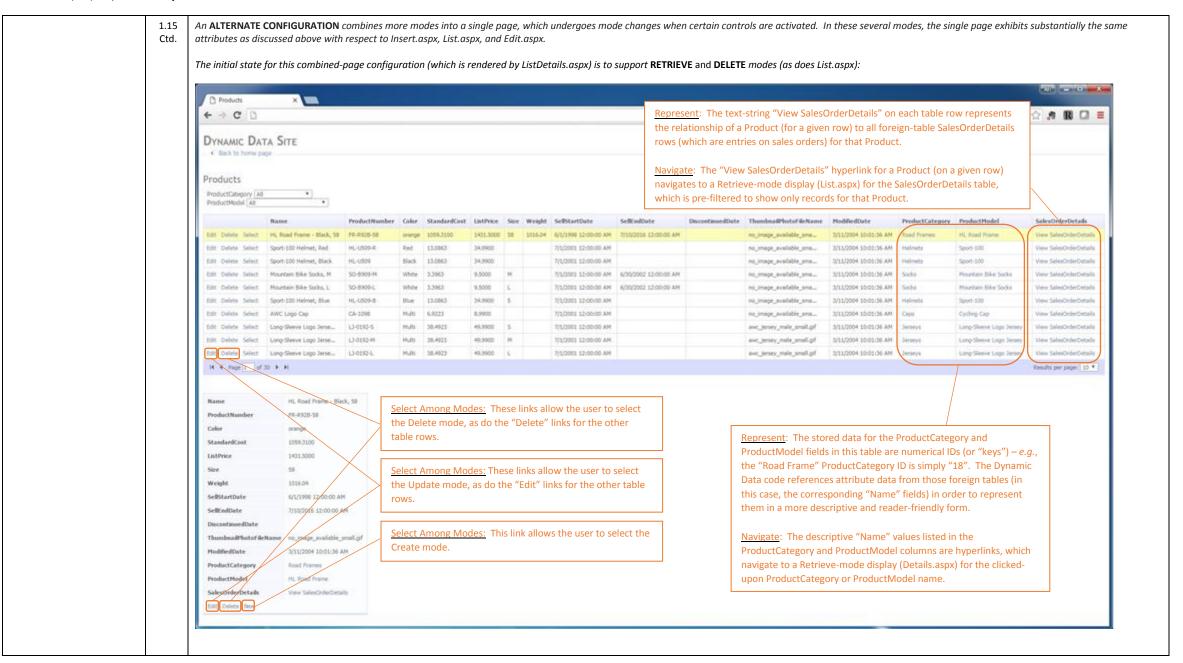


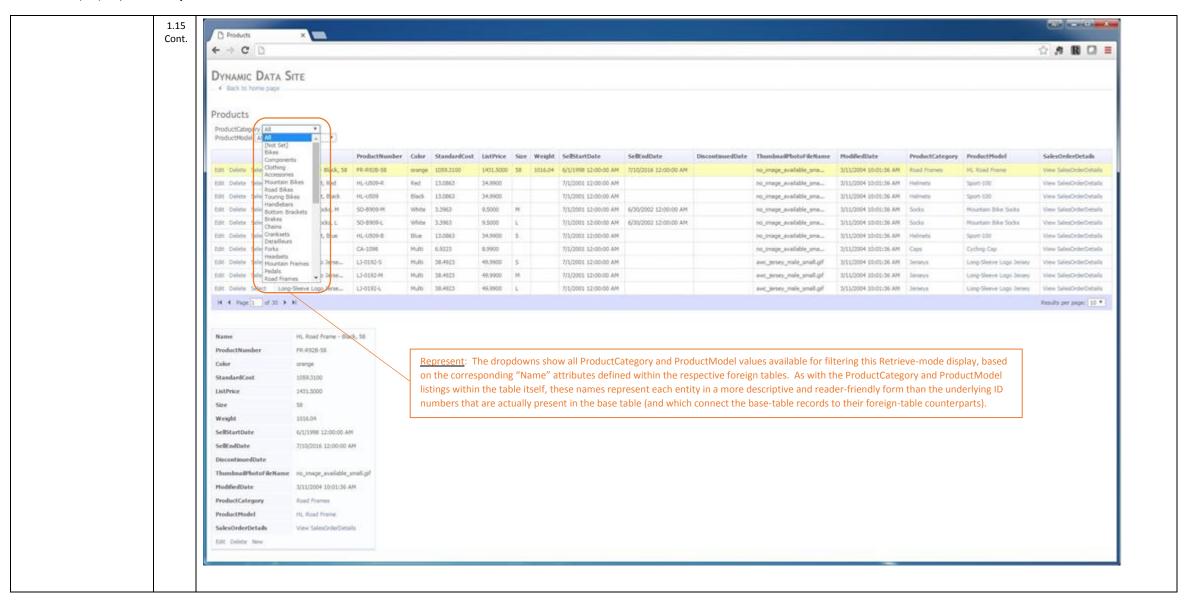


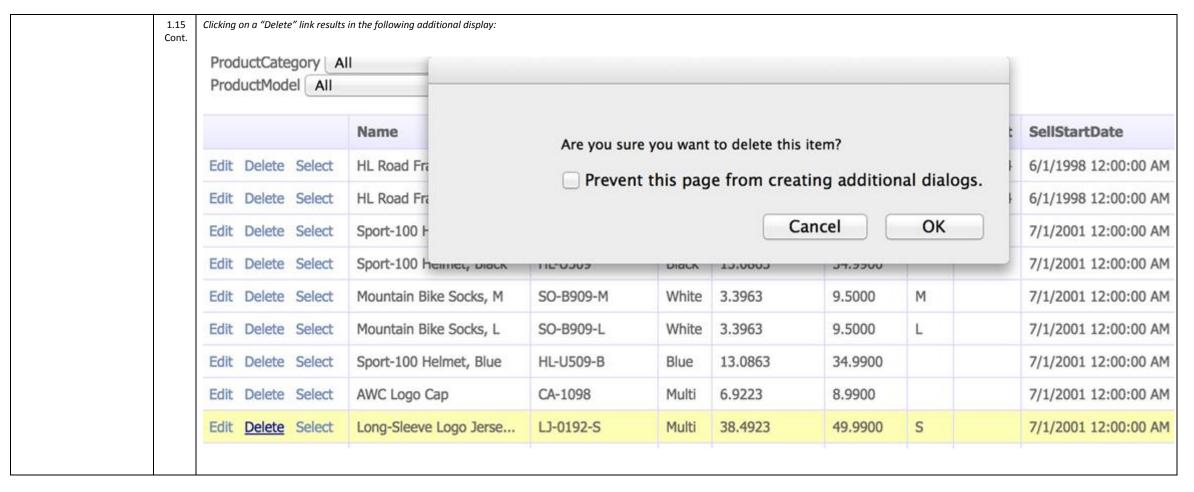
The same List.aspx page for RETRIEVE and DELETE modes is shown with one of the dropdown lists expanded: 1.15 Cont. W = 0 X Products 6 9 C D ☆カ限□≡ DYNAMIC DATA SITE Back to home page. Products ProductCate ProductNumber Color StandardCost ListPrice Size Weight SelfStartDate ProductCategory ProductHodel SellCodDate DiscontinuedDate ThumbnailPhotoFileName ModifiedDate SalesOrderDetails 6 ack, 58 FR-R929-58 orange 1059,3100 1431.5000 58 1016.04 6/1/1998 12:00:00 AM 7/10/2016 12:00:00 AM no_image_available_sma... 3/11/2004 10:01:36 AM Road Frames HL Road Frame View SalesOrderDetails Mountain Bikes View SalesOrderDetails. HL-U500-R Red 13.0863 34,9900 3/1/2001 12:00:00 AM no_image_available_sma... 3/11/2004 10:01:36 AM Helmets Sport-100 Road Billies 7/1/2001 12:00:00 AM no_image_available_sma... 2/11/2004 10:01:06 AM Walmets View SalesOrderDetails Touring Bikes HL-U509 Block 13.0863 34.9900 Sport-100 Handebary. 50-8909-M 9.5000 M 7/1/2001 12:00:00 AM 6/30/2002 12:00:00 AM no_image_evaluble_sina... 3/11/2004 10:01:06 AM | Socks Houstain Bile Socia View SalesOrderDetails White 3.3963 Bottom Brackets HL-0509-8 Diver 13.0863 34,9900 5 7/1/2001 12:00:00 AM ro_image_available_sma... 3/11/2004 10:01:36 AM Helmits Sport 100 View SalesOnderDetails Cranksets Multi 6.9023 8.9900 7/1/2001 12:00:00 AM no_image_available_sma_ Cycling Cap Year SalesOnterDetails erse___ L3-0192-5 Multi 38,4923 49,9900 5 7/1/2001 12:00:00 AM 3/11/2004 10:01:36 AM Surgeys Long-Sineve Logo Jersey View SalesOnderDetails Headsets Mountain Frames Jene... (3-0192-H Multi 38/623 49.9900 M. 7/1/2001 12:00:00 AM ave_lersey_male_small.gif 3/11/2004 10:01:36 AM Serseys Long-Sleeve Logo Jersey View SalesOrderDetails 7/1/2001 12:00:00 AM Long-Sleeve Logo Jersey - View SalesOrderDetails 3erse___ L3-0192-L Multi 38,4923 49.9900 L anc_lersey_male_small.gd 3/11/2004 10:01:36 AM Jerseys Road Frames le Long-Serve Lon Jerse 13-0192-X Hults 38,4923 49.9900 XL 7/1/2001 12:00:00 AM and Jersey male small.plf 3/11/2004 10:01:36 AM Jerseys Long-Sleeve Logo Jersey - View SalesOrderOetails H 4 Fags 1 | of 30 F H Results per page: | 10 * . Insert new Item Represent: The dropdowns show all ProductCategory and ProductModel values available for filtering this Retrieve-mode display, based on the corresponding "Name" attributes defined within the respective foreign tables. As with the ProductCategory and ProductModel listings within the table itself, these names represent each entity in a more descriptive and reader-friendly form than the underlying ID numbers that are actually present in the base table (and which connect the base-table records to their foreign-table counterparts).

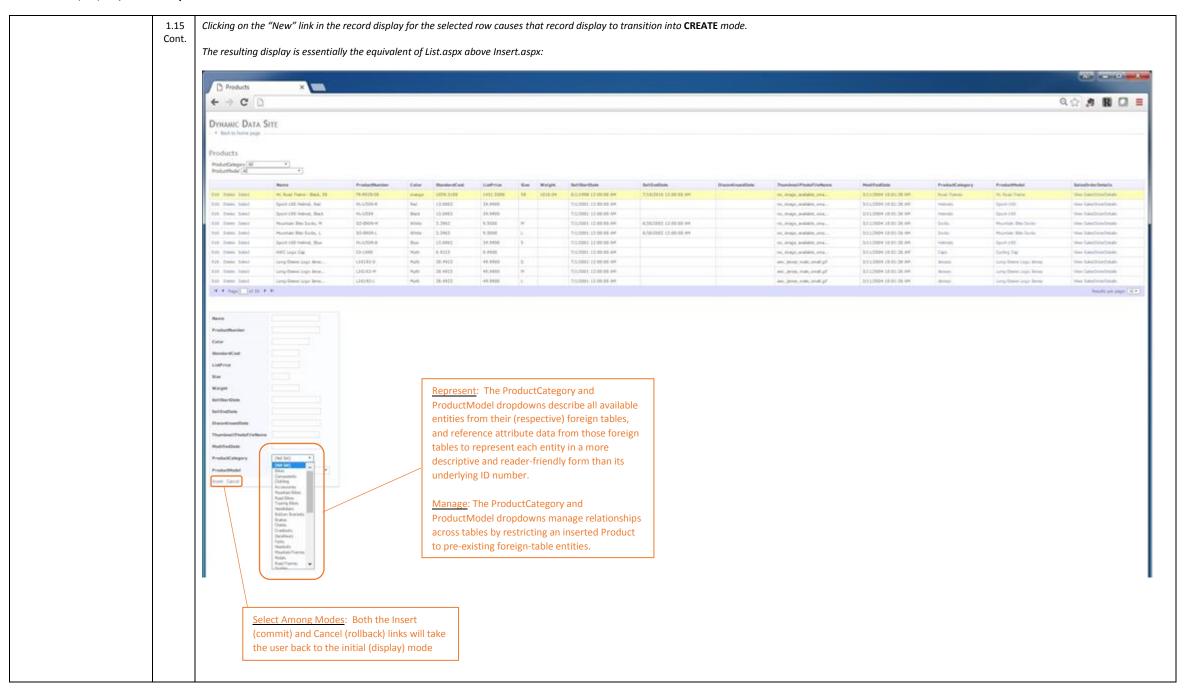
11





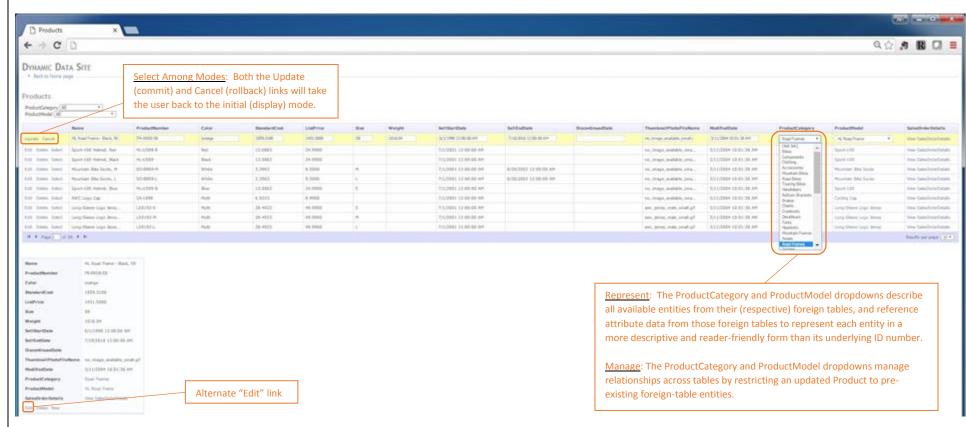






1.15 Clicking on the "Edit" link for the first item in the table causes the corresponding record display to transition into one of two **UPDATE** modes. In this variant, editable fields appear for the selected row within the table itself.

Cont. This display incorporates all of the same "represent", "select among modes", and "navigate" features discussed above (for the primary-configuration **UPDATE** mode), which will not be repeated here. The dropdown list for ProductCategory is shown as expanded:



In the second of the two **UPDATE** modes (not shown here), as activated by clicking on the alternate "Edit" link at the bottom of the expanded single-record display), the editable fields appear in the expanded single-record display (similar to the **CREATE**-mode display above).

The resulting display is essentially the equivalent of List.aspx above Edit.aspx.

while observing and enforcing relational interdependencies among data across said tables. 1.16 Dynamic Data "will choose the appropriate field template based on the field's type."

Foreign Key fields use a "HyperLink control that links to the associated entity in display mode, or a DropDownList control in edit mode."

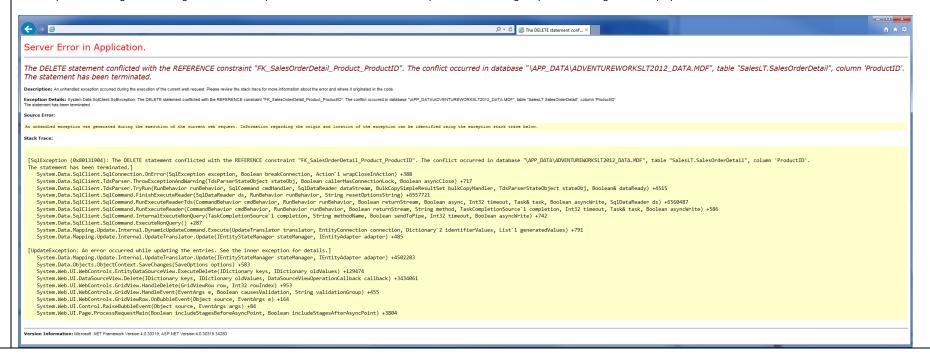
Dynamic Data "[d]isplays foreign-key columns...using meaningful textual representations (rather than displaying a numeric id value) that are rendered as hyperlinks. Clicking a link navigates to a scaffolded page for the parent table. In edit mode, foreign keys are rendered as drop-down lists that let a user modify the foreign-key value for that record."

Dynamic Data "[t]urns one-to-many relationship columns . . . into hyperlinks that navigate to a scaffolded page for that table."

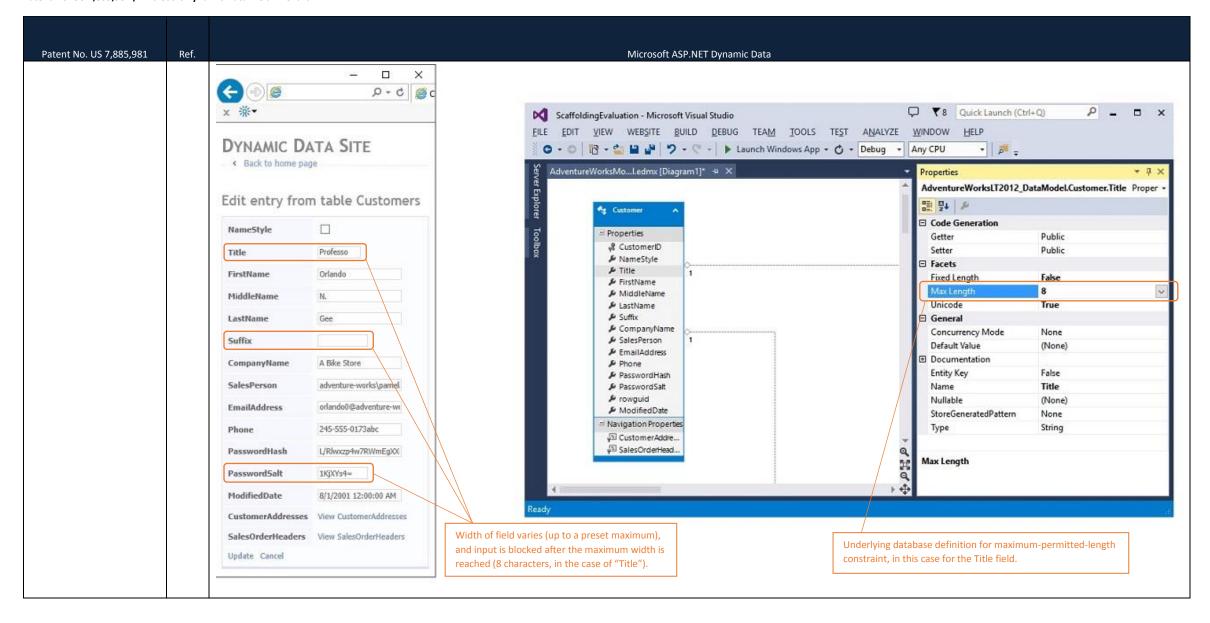
Parent/child relationships are represented by a "HyperLink control that navigates to a page that lists the records associated with the row."

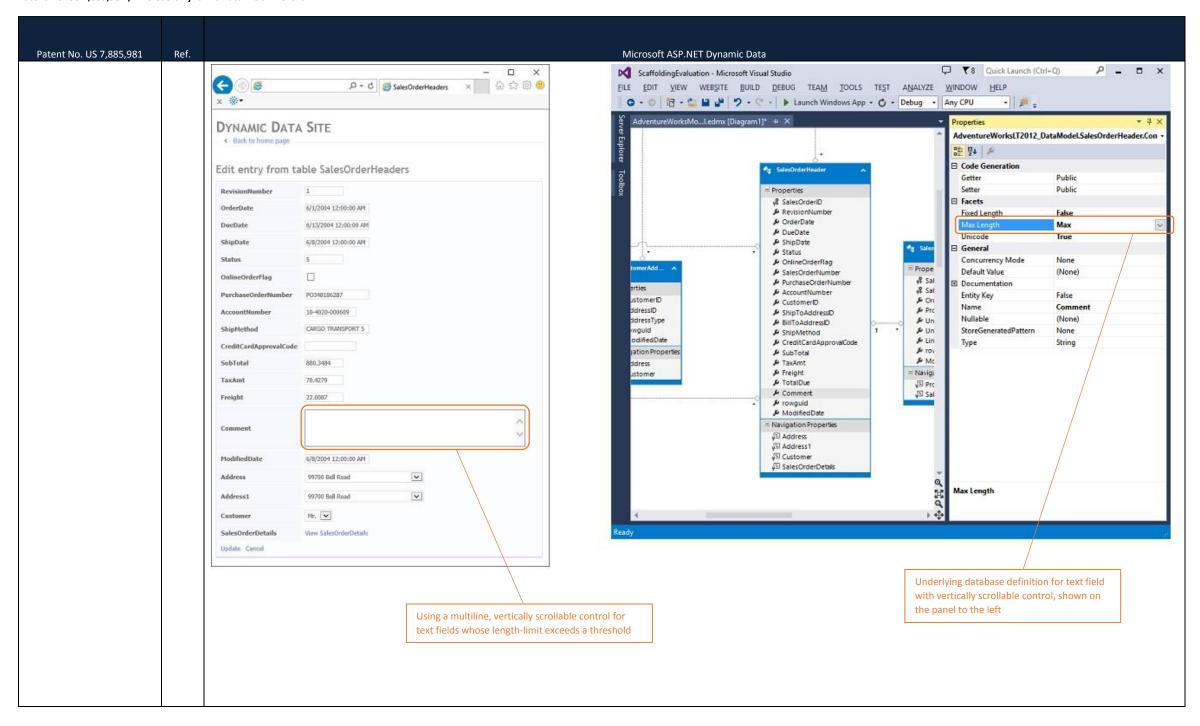
Source: An Introduction to Dynamic Data, available at: http://devproconnections.com/net-framework/introduction-dynamic-data

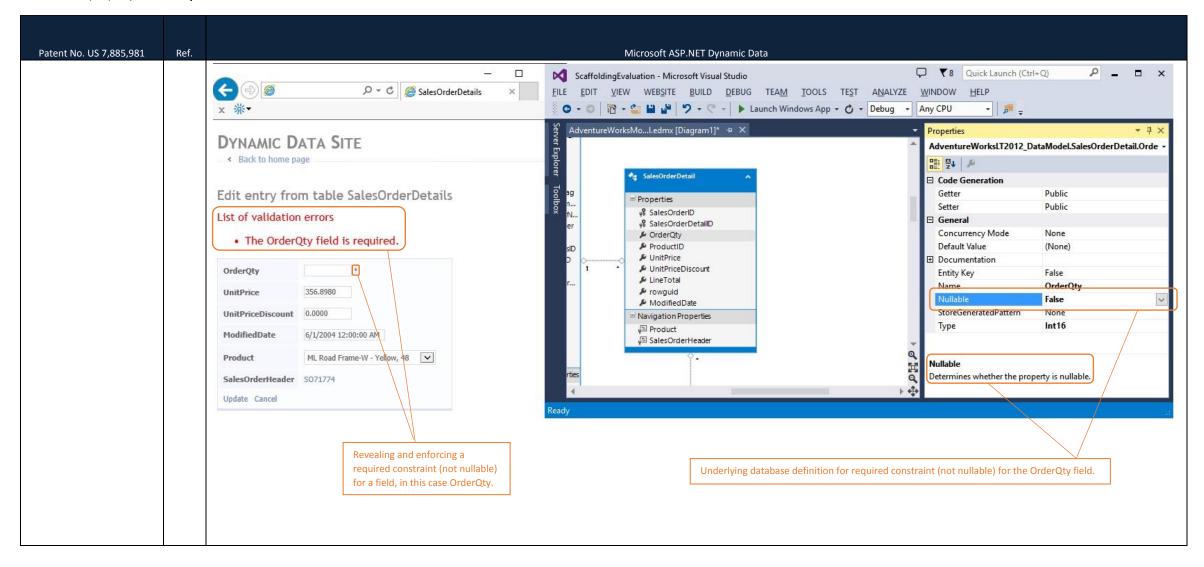
An example of observing and enforcing relational interdependencies occurs when a user attempts to delete a foreign key. The following error is displayed:

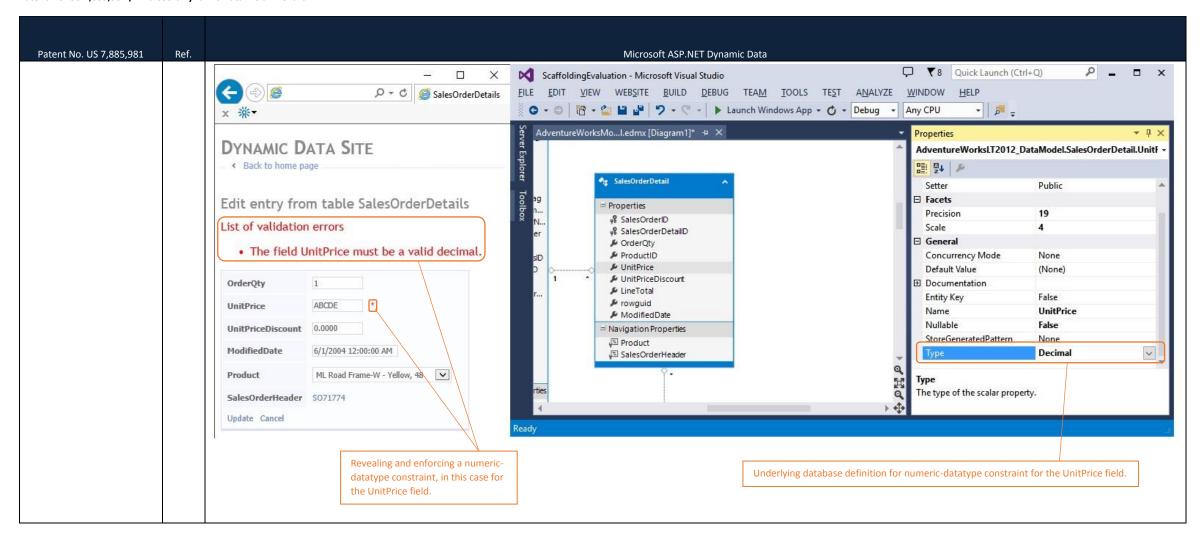


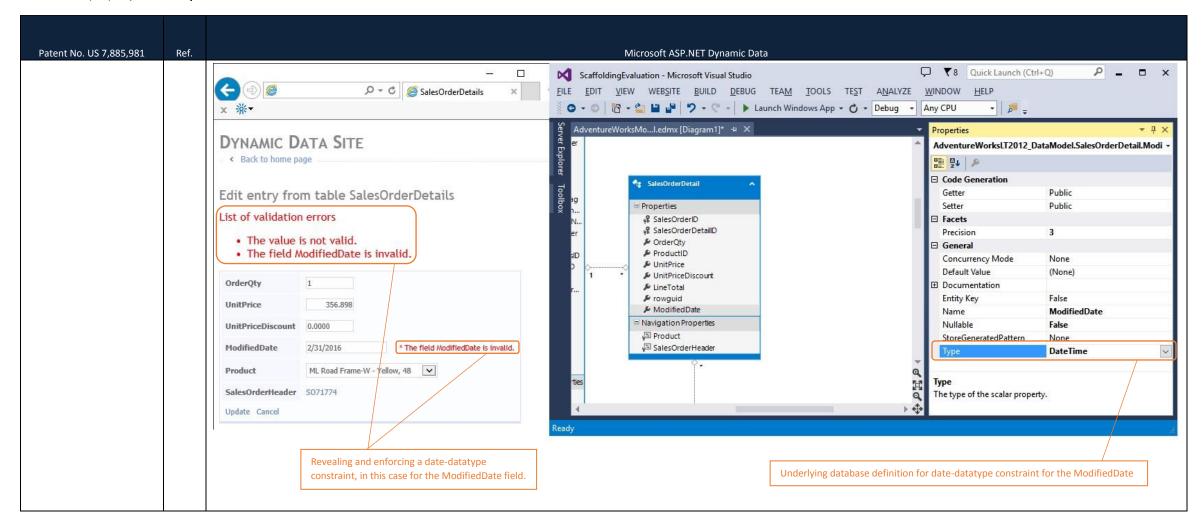
Patent No. US 7,885,981	Ref.	Microsoft ASP.NET Dynamic Data
2. The method of claim 1, further comprising	2a	See Ref. 1.1-16, above. Microsoft itself, through its internal use of Dynamic Data in developing software for itself and its customers, performs the method of Claim 2, and further induces users to use the method by providing Dynamic Data and promoting its use. The direct infringement in such a case of induced infringement by Microsoft is the user's performing the method of Claim 2 by using Dynamic Data. Microsoft further contributes to the infringement of Claim 2 by providing the ASP.NET Dynamic Data software module to users. Microsoft supplies components containing such software modules in the form of tangible media including but not limited to compact discs and DVDs containing the Accused Products, as well as downloads, in which Microsoft makes a server-side tangible copy of Accused Products available for users to copy onto their own tangible media via download, as a result of which the Users then have the patented systems for use in practicing the patented processes.
incorporating within said client application components for revealing and enforcing non-relational constraints defined within said database for each individual tablecolumn.	2b	Below are five pairs of screens, the left screen showing the Dynamic Data front-end, and the right showing the underlying database, in relevant part.



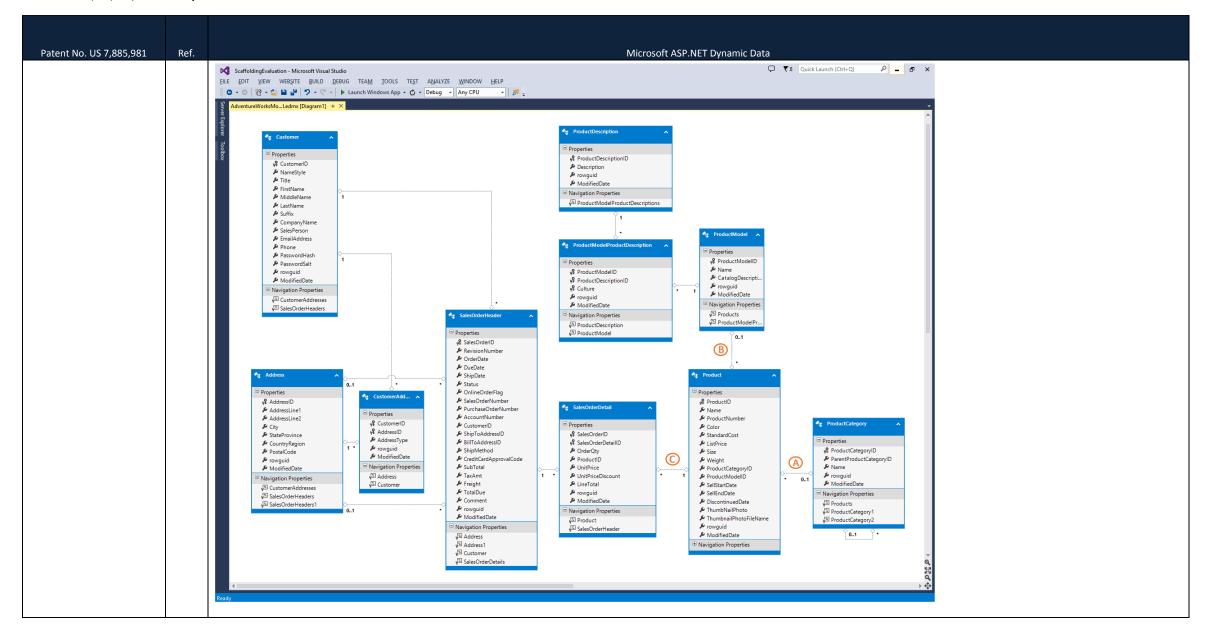


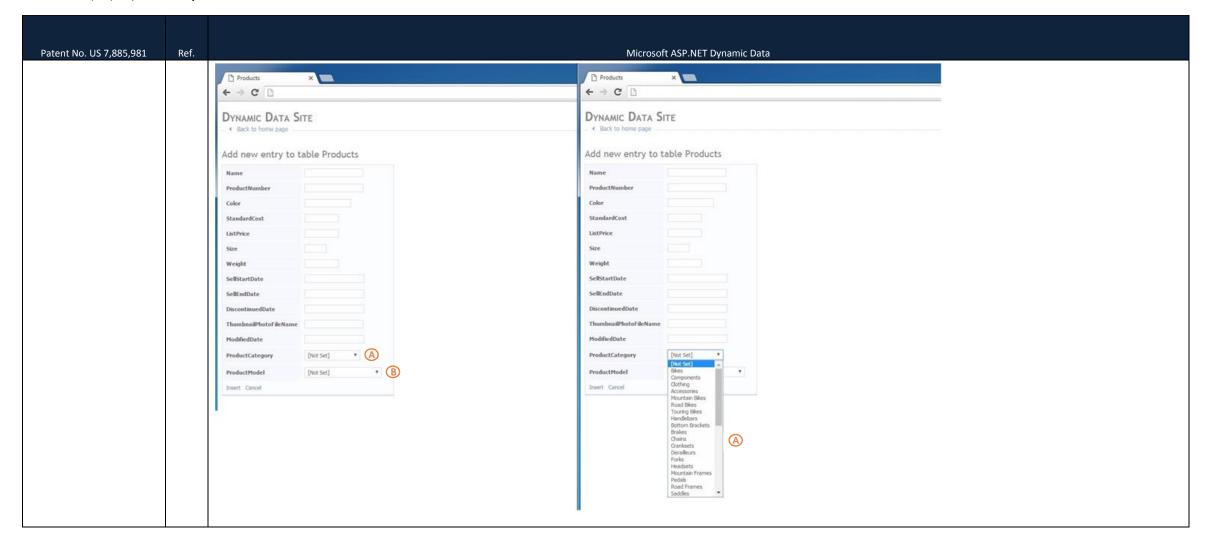


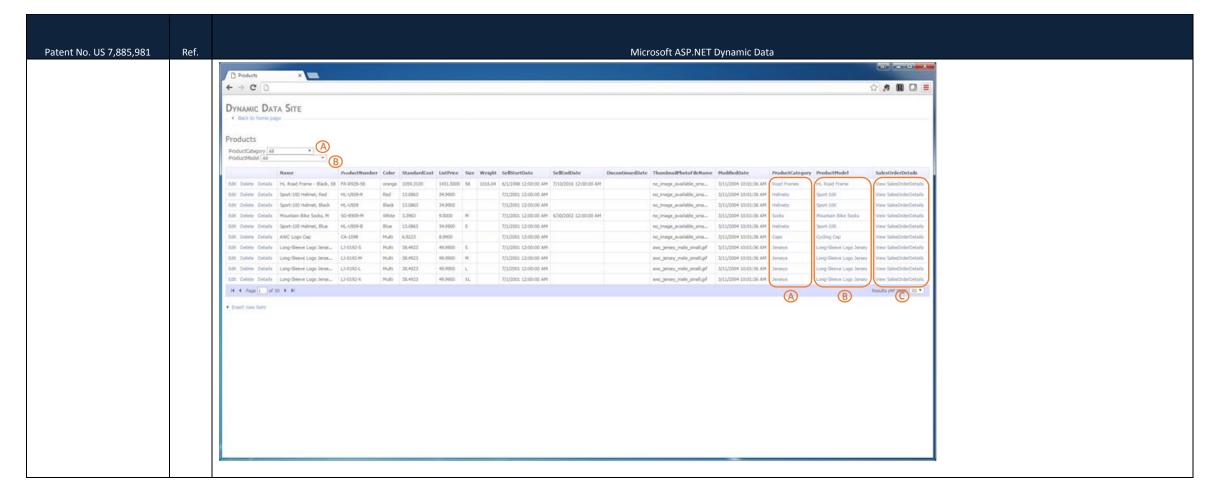


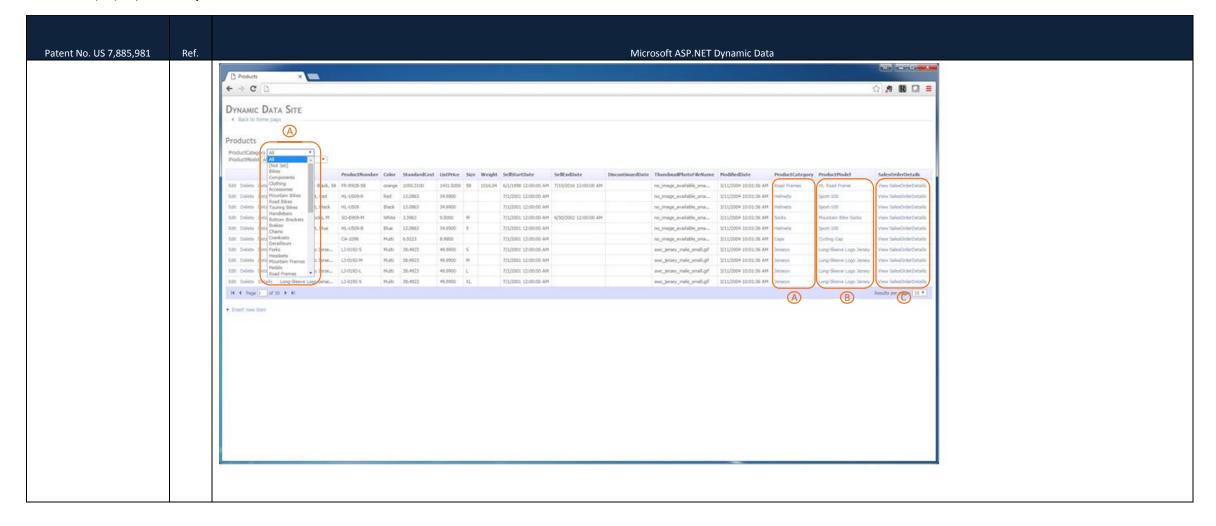


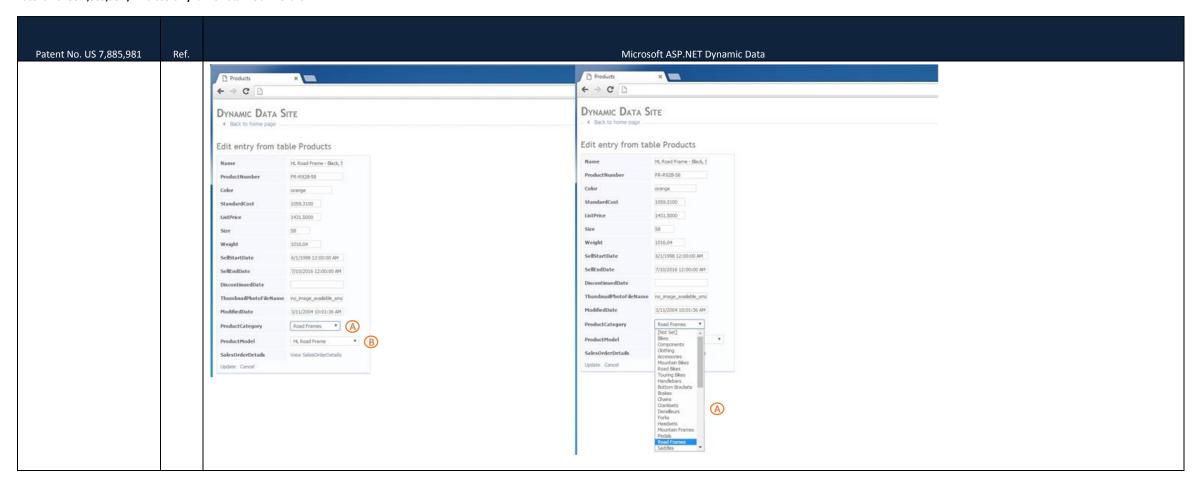
Patent No. US 7,885,981	Ref.	Microsoft ASP.NET Dynamic Data
3. The method of claim 1,	3a	See Ref. 1.1-16, above.
		Microsoft itself, through its internal use of Dynamic Data in developing software for itself and its customers, performs the method of Claim 3, and further induces users to use the method by providing Dynamic Data and promoting its use. The direct infringement in such a case of induced infringement by Microsoft is the user's performing the method of Claim 3 by using Dynamic Data. Microsoft further contributes to the infringement of Claim 3 by providing the ASP.NET Dynamic Data software module to users. Microsoft supplies components containing such software modules in the form of tangible media including but not limited to compact discs and DVDs containing the Accused Products, as well as downloads, in which Microsoft makes a server-side tangible copy of Accused Products available for users to copy onto their own tangible media via download, as a result of which the Users then have the patented systems for use in practicing the patented processes.
wherein said relational interdependencies are embodied in referential-integrity constraints within the underlying database.		Below is a schema diagram for the underlying database, and thereafter are multiple screens for the Dynamic Data front-end showing the interdependencies. Items A, B, and C are notated in the schema diagram and in the following screens.

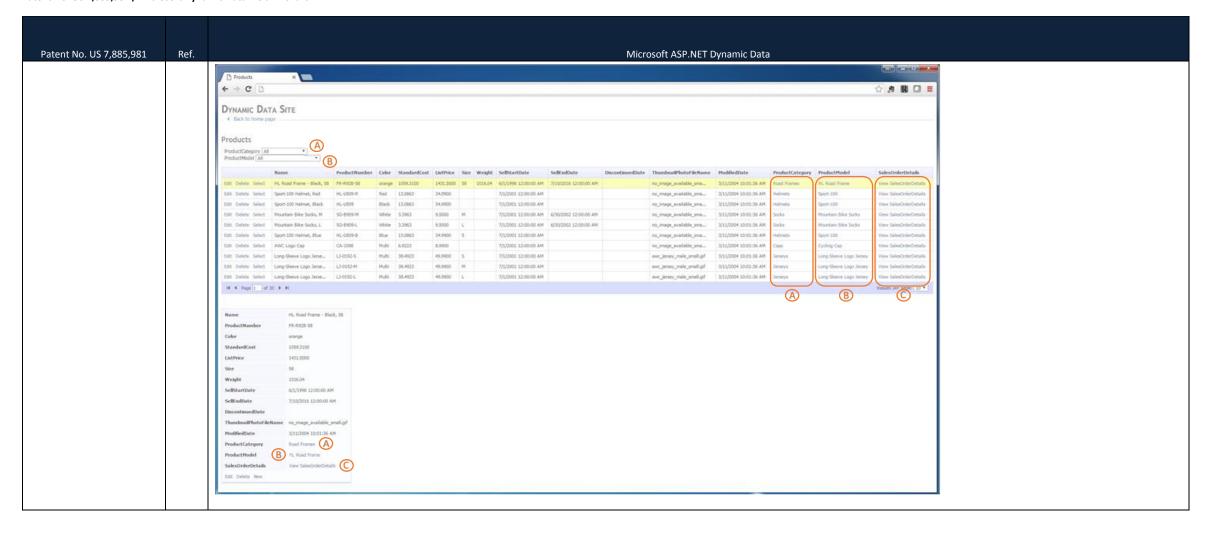


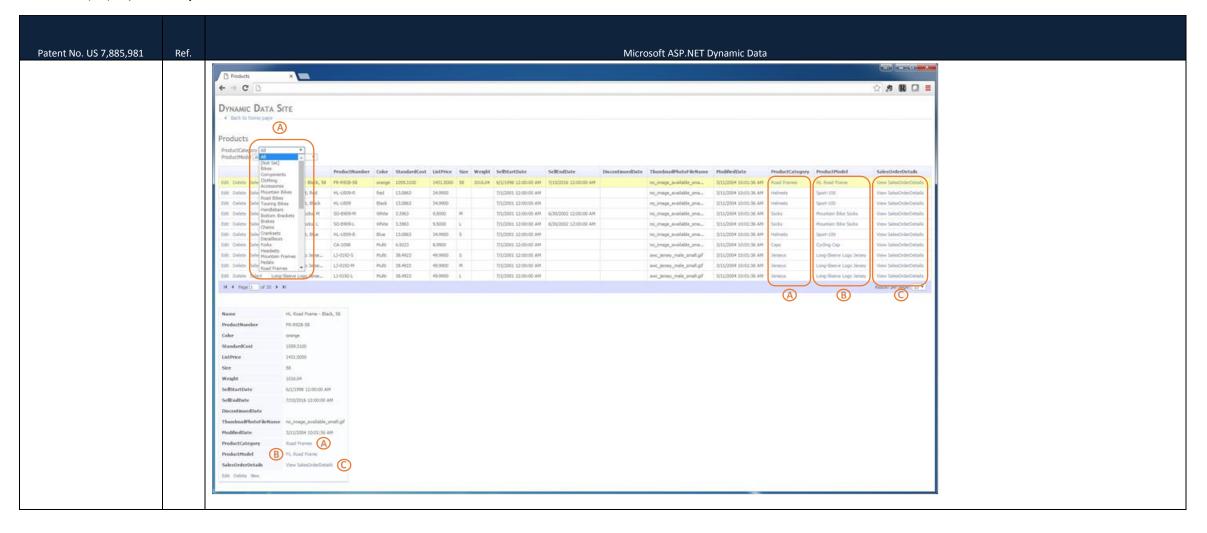


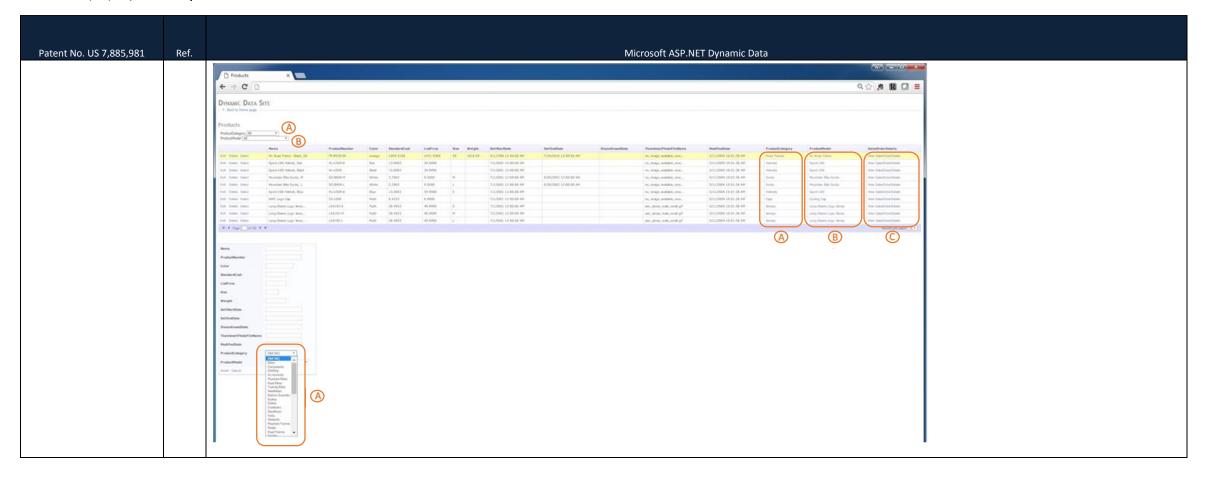


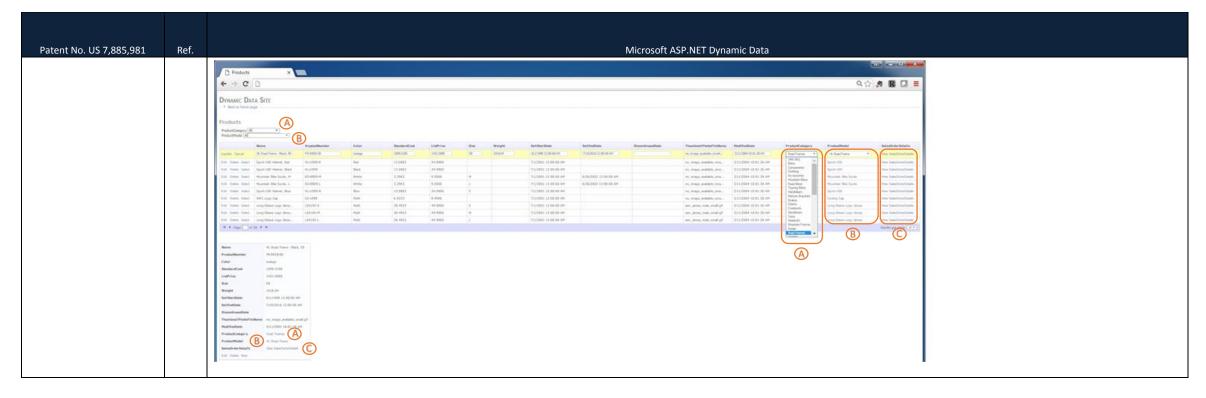












Patent No. US 7,885,981	Ref.	Microsoft ASP.NET Dynamic Data
4. A computer-implemented system for	4.1	When software that performs the method of claim 1 is loaded on a typical user computer, a "system" exists as claimed. Microsoft itself makes and uses such "systems" via its internal use of Dynamic Data, and further induces users to make and use such "systems" by providing Dynamic Data and promoting its use. The direct infringement in such a case is the user's loading the software onto a computer (making a system) and the user's use of that system. Microsoft further contributes to the infringement of Claim 4 by providing the ASP.NET Dynamic Data software module to users. Microsoft supplies components containing such software modules in the form of tangible media including but not limited to compact discs and DVDs containing the Accused Products, as well as downloads, in which Microsoft makes a server-side tangible copy of Accused Products available for users to copy onto their own tangible media via download, which then becomes a "system" as claimed.
automatically generating an end-user interface for working with the data within a relational database	4.2	See Ref. 1.2, above.
defined within a relational DBMS whose data is stored in machine-readable media and which is accessible to said system,	4.3	See Ref. 1.3, above. The relational DBMS has data stored on machine-readable media, which is accessible to the computer on which the software that performs the method of claim 1 is loaded. This accessibility is shown in the discussion above for claim 1, with the relational DBMS being accessed from Dynamic Data.
wherein said relational database comprises a plurality of tables, constraints and relationships in accordance with a data model comprising said tables and their column-complements and datatypes, said constraints, and the relationships across said tables,	4.4	See Ref. 1.4, above.
and wherein said relational database may be of any arbitrary size or complexity,	4.5	See Ref. 1.5, above.
said system comprising a server comprising a processor, said server further comprising:	4.5a	See Ref. 1.1, above. As discussed with respect to 1.1 above, Web applications require servers to function. The servers comprise a processor and machine-readable media comprising machine-readable routines.
(a) machine-readable routines to provide an output stream for user display and input devices,	4.6	See Ref. 1.6, above.

Patent No. US 7,885,981 defining a user interface paradigm comprising a set of modes for interacting with a given database table,	Ref. 4.7	See Ref. 1.7, above.
said modes comprising create, retrieve, update and delete,	4.8	See Ref. 1.8, above.
and a corresponding display format for each mode;	4.9	See Ref. 1.9, above.
(b) machine-readable routines for scanning said database and applying a body of rules to determine the table structures, constraints and relationships of said data model,	4.10	See Ref. 1.10, above.
and for storing representations thereof; and	4.11	See Ref. 1.11, above.
(c) machine-readable routines for using said representations to construct a corresponding client application,	4.12	See Ref. 1.12, above.
wherein said client application provides a connection to said database,	4.13	See Ref. 1.13, above.

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provides displays of the table contents of said database for each of said modes in accordance with the display formats of said paradigm,	4.14	See Ref. 1.14, above.
integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation,	4.15	See Ref. 1.15, above.
while observing and enforcing relational interdependencies among data across said tables.	4.16	See Ref. 1.16, above.

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5. A computer-readable storage medium containing a set of instructions for a general purpose computer, for	5.1	Software that performs the method of claim 1 is non-transitorily recorded on a machine-readable medium, for example, a CD or DVD for distributing such software, a hard drive of a server from which such software may be downloaded over a network connection for distribution, or the working memory of a computer, on which said software has been loaded for execution. Microsoft itself makes, uses, offers to sell, and sells such computer-readable storage media, and further induces users to make and use such computer-readable storage media by providing Dynamic Data and promoting its use. The direct infringement in such a case is the user's loading of the software onto his or her computer (making) and the user's use of the computer when so loaded (use).
automatically generating an end-user interface for working with the data within a relational database,	5.2	See Ref. 1.2, above.
wherein said relational database comprises a plurality of tables, constraints and relationships in accordance with a data model comprising said tables and their column-complements and datatypes, said constraints, and the relationships across said tables,	5.3	See Ref. 1.4, above.
and wherein said relational database may be of any arbitrary size or complexity, said set of instructions comprising:	5.4	See Ref. 1.5, above.
(a) a routine for providing a user interface paradigm comprising a set of modes for interacting with a given database table,	5.5	See Ref. 1.7, above.
said modes comprising create, retrieve, update and delete,	5.6	See Ref. 1.8, above.
and a corresponding display format for each mode;	5.7	See Ref. 1.9, above.

Patent No. US 7,885,981	Ref.	Microsoft ASP.NET Dynamic Data
(b) a routine for scanning said database and applying a body of rules to determine the table structures, constraints and relationships of said data model,	5.8	See Ref. 1.10, above.
and for storing representations thereof; and	5.9	See Ref. 1.11, above.
(c) a routine for using said representations to construct a corresponding client application,	5.10	See Ref. 1.12, above.
wherein said client application provides a connection to said database,	5.11	See Ref. 1.13, above.
provides displays of the table contents of said database for each of said modes in accordance with the display formats of said paradigm,	5.12	See Ref. 1.14, above.
integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation,	5.13	See Ref. 1.15, above.
while observing and enforcing relational interdependencies among data across said tables.	5.14	See Ref. 1.16, above.

CERTIFICATE OF SERVICE

On this 23rd day of August, 2016, I certify that I caused a copy of Plaintiff's Disclosure of Asserted Claims and Infringement Contentions to Defendant Microsoft Corporation to be served upon the below-listed counsel of record for Defendant via email.

Dated: August 23, 2016

s/ Ronald Abramson
Ronald Abramson

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